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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

JANE DOE and MARY ROE,
 Plaintiffs,
 v.
 GENERAL MICHAEL W. HAGEE,
 Commandant of the U.S. Marine Corps,
 THE U.S. MARINE CORPS, DONALD C.
 WINTER, Secretary of the Navy, THE U.S.
 NAVY, BRIAN FUKUSHIMA, JOSEPH
 DUNZWEILER, and DOES 1-10,
 Defendants.

No. C 06-01777 MHP
E-FILING CASE

**STIPULATION AND ~~PROPOSED~~
 ORDER REQUESTING
 CONTINUANCE OF DISPOSITIVE
 MOTION DATES AND SOME
 DISCOVERY MATTERS**

The parties stipulate and respectfully request the Court to continue the dispositive motion briefing and hearing dates by two weeks, and to allow plaintiffs to take two depositions – of Special Agent Kevin Toeve and Major Doug Alexander – after the fact discovery cutoff, if they choose to.

The reasons for defendants’ request to change the dispositive motion schedule are (1) defendants’ counsel has just been assigned to a trial beginning on July 9, which is the current dispositive motion hearing date; (2) the parties have a settlement conference set for next Wednesday, which could render further proceedings moot; and (3) the deposition of one plaintiff

will not take place until the day before or after the settlement conference, which means that the deposition transcript would not be available for the motion. The reason for plaintiffs' request to take two depositions after the fact discovery cut-off is that both depositions require travel to the Washington, D.C. area, and the expense and time that these depositions will cost might be saved if the settlement conference is successful.

So stipulated and respectfully submitted,
For the Federal Defendants.

SCOTT N. SCHOOLS
United States Attorney

Dated: May 21, 2007

/s/

OWEN P. MARTIKAN
Assistant United States Attorney

For the Plaintiffs.

Dated: May 21, 2007

/s/

MICHAEL S. SORGEN
Attorneys for Plaintiffs

~~[PROPOSED]~~ ORDER

Pursuant to stipulation and for good cause shown, dispositive motions shall be filed by June 15, 2007, oppositions shall be filed by July 2, 2007, replies shall be filed by July 9, 2007, and the hearing shall take place on July 23, 2007 at 2:00pm. The depositions of Special Agent Kevin Toevs and Major Doug Alexander may take place after the fact discovery cutoff. at a date set by the court at the July 23, 2007 hearing.
SO ORDERED.

Dated: May 23, 2007

